

U.S. Department of Education

**Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues**

RECOMMENDATION PAGE

1. **Agency:** Distance Education and Training Council (1959/2007)
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Compliance Report
3. **Current Scope of Recognition:** The accreditation of postsecondary institutions in the United States that offer degree programs primarily by distance education up through professional doctoral degrees, and are specifically certified by the agency as accredited for Title IV purposes; and for the accreditation of postsecondary institutions in the United States not participating in Title IV that offer programs primarily by distance education or correspondence education up through professional doctoral degrees.
4. **Requested Scope of Recognition:** Same.
5. **Date of Advisory Committee Meeting:** December, 2012
6. **Staff Recommendation:** Renew the agency's recognition for a period of four and a half years.
7. **Issues or Problems:** None.

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Distance Education and Training Council (DETC) accredits postsecondary institutions that offer programs primarily by the distance education method. At present, the agency accredits 100 postsecondary institutions within the United States. The agency also accredits some high schools and two non-US institutions, but those institutions are not included in the agency's recognition.

The agency's recognition enables its postsecondary institutions that offer degree programs, and that have undergone an additional DETC screening process, to establish eligibility to receive Federal student assistance funding under Title IV of the Higher Education Act of 1965, as amended (Title IV). The agency currently serves as the Title IV gatekeeper for thirteen institutions.

Recognition History

DETC is currently listed by the Secretary of Education as a nationally recognized accrediting agency, and it first held that status in 1959 under its previous name, the National Home Study Council. Since that time, the Secretary periodically reviewed the agency and has granted continued recognition.

The last full review of DETC took place at the June 2012 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). After that review, the agency's current recognition was continued and a compliance report on the issues cited in the staff analysis was requested. The current compliance report was submitted in response to that request.

PART II: SUMMARY OF FINDINGS

§602.24 Additional procedures certain institutional accreditors must have.

If the agency is an institutional accrediting agency and its accreditation or preaccreditation enables those institutions to obtain eligibility to participate in Title IV, HEA programs, the agency must demonstrate that it has established and uses all of the following procedures:

(3) The accrediting agency must take such actions that it deems appropriate to address any deficiencies that it identifies at an institution as part of its reviews and evaluations under paragraph (f)(1)(i) and (ii) of this section, as it does in relation to other deficiencies it may identify, subject to the requirements of this part.

Previous Issue or Problem: During its June 2012 review of the agency, Department staff noted that DETC needed to discuss how it determined whether an institution's response was, or was not, satisfactory to an issue that the agency raised regarding the institution's credit hour practices. Specifically, the institution was cited for not correctly identifying for its students the amount of outside work that would be expected of them.

Department staff noted that the agency had given its citation of the institution as evidence of how DETC handles deficiencies surrounding credit hours. However, DETC could only note that the institution responded to DETC. Since the agency's decision meeting had not yet taken place, the agency could not provide evidence of how DETC actually evaluated the institution's response. Therefore, the agency was asked to provide the current report after it had completed its decision meeting where the matter was discussed.

Agency Response and Discussion: The agency provided documentation to show that its decision-makers met in June 2012 and evaluated the institution's response regarding compliance with DETC's credit hour requirements. The decision-makers found that the institution had made the corrections needed to be found in compliance with the public disclosure aspects of DETC's policy on credit hours.

However, the decision-makers also found that the institution was operating under a previous version of the agency's credit hour requirements. Therefore, the institution was put on show cause until it can provide documentation (due December 2012) demonstrating compliance with the revised policy. The revised policy requires that the amount of academic credit assigned to each course and degree program be both appropriate and accurate.

As a result of receiving this clarifying documentation, the agency can be found in compliance with the requirements of this section.

§602.26 Notification of accrediting decisions

The agency must demonstrate that it has established and follows written procedures requiring it to provide written notice of its accrediting decisions to the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and the public. The agency meets this requirement if the agency, following its written procedures--

(b) Provides written notice of the following types of decisions to the Secretary, the appropriate State licensing or authorizing agency, and the appropriate accrediting agencies at the same time it notifies the institution or program of the decision, but no later than 30 days after it reaches the decision:

- (1) A final decision to place an institution or program on probation or an equivalent status.**
- (2) A final decision to deny, withdraw, suspend, revoke, or terminate the accreditation or preaccreditation of an institution or program;**
- (3) A final decision to take any other adverse action, as defined by the agency, not listed in paragraph (b)(2) of this section;**

Previous Issue or Problem: During its June 2012 review of the agency, Department staff noted that DETC needed to provide documentation that it sends timely written notifications of final adverse actions to the Secretary, as well as to the appropriate accrediting and state agencies at the same time it notifies the institution of the decision.

Specifically, DETC was unable to clearly document that it provided the required notice at the same time it notified the institution of a final adverse decision because the sample letter submitted with the petition did not identify the actual date the adverse decision became final, and there was no evidence that the same notification letter, or a similar one, was being sent to the appropriate state agencies or accrediting agencies. It appeared the agency was equating the specific notification to the Secretary, required at the same time the institution received it, with the separate requirement to provide a general announcement to the public within 24 hours.

Agency Response and Discussion: The agency provided documentation to show that its decision-makers revised and adopted the DETC notification policy. The policy now specifies that “Unless otherwise specified, the effective date of a Commission’s decision is the date on the letter notifying the institution of the Commission’s decision.” In addition, the effective date triggers the same-time notice to the Department of Education, the state regulators and the appropriate accrediting agencies.

Furthermore, the agency adopted an internal policy requiring DETC to provide the same-time notices to the Department of Education, the state regulators and the appropriate accrediting agencies in separate correspondence, rather than in a general notice that could be overlooked, thereby making the final adverse decision notifications both specific and prominent. The agency also provided documentation that it has effectively implemented its revised notification policy.

As a result of these documented changes, the agency can be found in compliance with the requirements of this section.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third-party comments regarding this agency.